

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and 101 of the)	WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of)	RM-11614
Fixed and Mobile Broadband Access, Educational)	
and Other Advanced Services in the 2150-2162)	
and 2500-2690 MHz Bands)	

Comments of Catholic Television Network and National EBS Association

The Catholic Television Network ("CTN") and the National EBS Association ("NEBSA"), which are the primary representative organizations for the Educational Broadband Service ("EBS") community, submit these comments in support of the proposed changes to Section 27.53(m) of the Commission's rules proposed by the Wireless Communications Association International ("WCAI").

As a result of the adoption of a new 2.5 GHz band plan, EBS is playing an increasingly important role in transforming the way educational services are delivered throughout the United States. Accordingly, CTN and NEBSA members have a strong interest in any proposed changes to the rules governing the 2.5 GHz band that enhance the efficient and effective use of the spectrum.

In its October 22, 2010 Petition for Rulemaking, WCAI asked the Commission to amend its rules governing out-of-band-emission ("OOBE") limits for mobile digital stations in the 2.5 GHz band to accommodate the use of wider channel bandwidths. In this proceeding, the Commission seeks comment on whether it should modify the out-of-band emission limits as requested by WCAI.

CTN and NEBSA support the proposed rule change and agree with WCAI that amending the OOB limits in the 2.5 GHz band as requested is necessary to realize the full benefits of 4G technologies and better align the Commission's rules with the approach of the global 3rd Generation Partnership Project ("3GPP") and future WiMAX standards applicable to the 2.5 GHz band. Providing for operation of wider channel bandwidths will promote efficient use of the spectrum and help achieve the goals of the National Broadband Plan for mobile broadband. Moreover, harmonizing the Commission's rules with the applicable 3GPP standard and future WiMAX standards should enable manufacturers and network operators to realize economies of scope and scale in 2.5 GHz mobile devices, which would otherwise need to be customized for use in the United States. Any potential risks of interference appear to be remote and far outweighed by the benefits of implementation of the WCAI proposal.

EBS licensees are uniquely positioned to take advantage of robust and efficient 2.5 GHz broadband networks. Through EBS eligibility and educational use rules, the Commission has demonstrated its commitment to education and empowered educational licensees to use the spectrum in ways that best serve changing educational needs. As a result, EBS licensees and commercial operators/lessees have been working together to deploy wireless broadband on networks that include EBS spectrum. Across the country, EBS licensees are actively implementing this broadband use in their schools and local communities to transform education through new and innovative technology. The WCAI proposal furthers the ongoing expansion of this educational use by facilitating economical 2.5 GHz mobile devices and high-bandwidth applications that are now being widely deployed in schools.

In summary, CTN and NEBSA support adoption of the modifications to the OOB rule proposed by WCAI and agree with WCAI that adoption of the proposed rule change would facilitate the rapid deployment of 4G mobile broadband services in the 2.5 GHz band nationwide.

Respectfully submitted,

The Catholic Television Network

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